

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant.

HEIDI YOAST,

Counterclaim-Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,
SHELLY COLE aka SHELLY HOWRIGON,
an individual, ROD REID, an individual,

Counterclaim-Defendants.

NO. 16-cv-1573-RSL

DECLARATION OF PAMELA BIERMAN

Being duly sworn under her oath, Pamela Bierman states as follows:

1. My name is Pam Bierman. For close to forty (40) years I have been employed by and/or the owner of Doc Morgan Inc. I have owned Doc Morgan for the last eighteen (18) years. I am over the age of twenty-one (21) and under no legal disability.

2. I have personal knowledge of the facts set forth herein and if called to testify would state and allege the following.

DECLARATION OF PAMELA BIERMAN
(16-cv-1573-RSL)

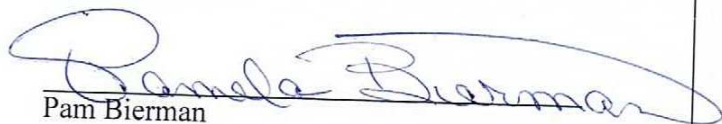
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2 3. Since at least 1980, Doc Morgan has produced various jewelry, clothing, and
3 other items bearing various JDI trademarks as a licensed vendor. Specifically, Doc Morgan has
4 often utilized the "Job's Daughters" "TYOB FILIAE" and "JDI" marks on various clothing items,
5 garment bags and other items we have produced and sold to JDI members. In addition, we will
6 work with JDI members on specialty items and/or other requested items that utilize the JDI
7 trademarks.

8 4. In addition, since at least 1980, Doc Morgan has produced and distributed
9 catalogs showing various items we sell. Those items would include the JDI trademarks. In
10 addition, since at least 2010, Doc Morgan has also advertised various items utilizing the JDI
11 trademarks at www.docmorgan.com and then at www.jdistore.com.

12 I declare under penalty of perjury that the foregoing is true and correct to the best of my
13 knowledge and recollection.

14 DATED this 26th day of March at St. Charles, Illinois.

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16 Pam Bierman

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27 DECLARATION OF PAMELA BIERMAN
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CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2018, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following:

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Tracey v. Munger tracey@groveslawoffices.com

DATED this 26th day of March, 2018.

s/ Rodney L. Umberger

s/ Daniel J. Velloth

Rodney L. Umberger, Jr., WSBA #24948

Daniel J. Velloth, WSBA #44379

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DECLARATION OF PAMELA BIERMAN

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